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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KERMIT BAYLESS,

Plaintiff,

V.

CLARK COUNTY SCHOOL DISTRICT, a Nevada Public Governmental Entity; BRITTNEY NUANEZ, an individual; KATHERINE EVANS, an individual; SARAH HAMILTON, an individual; THITIYA KARAMOOZ, an individual; RACHELLE DUGGINS-TETLOW, an individual; REECE OSWALT, an individual; WALTER HANNA, an individual; ZACK HARLAN, an individual; CEDRIC COLE, an individual; CHRISTIE ANN GUIDA, an individual; CHRISTOPHER KLEMP, an individual; MOLLIE HALL, an individual; DOES Individuals, I through XX, inclusive; and, ROE CORPORATIONS AND BUSINESS ENTITIES I through XX, inclusive,

Defendants.

| Case No.: 2:25-cv-00050-JAD-MDC

**STIPULATION AND ORDER
EXTENDING DEADLINE FOR
PLAINTIFF'S OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS
COMPLAINT, RESETTING DATE FOR
JOINT STATUS REPORT, AND
RESETTING HEARING OF
DEFENDANT'S MOTION TO DISMISS
COMPLAINT**

ECF No. 10

COMES NOW Plaintiff, KERMIT BAYLES, by and through his attorneys of record STEVEN T. JAFFE, ESQ. of HALL JAFFE, LLP, and DEFENDANTS, by and through their counsel of record, CRYSTAL J. PUGH, ESQ., and BETTY J. FOLEY, ESQ., of CLARK COUNTY SCHOOL DISTRICT OFFICE OF THE GENERAL COUNSEL who hereby respectfully submits this Stipulation and Order, as follows:

1. Extend deadline for Plaintiff to respond to Defendants' Motion to Dismiss Complaint
- 2 until February 14, 2025;
3. Extending the deadline for the Joint Status Report until February 23, 2025; and,
4. Reset the hearing date for the Motion to Dismiss to the Court's first available date after
- 5 an opportunity for Defendants to file their Reply Brief to any Opposition filed by
- 6 Plaintiff to the Defendants' Motion to Dismiss Complaint.

7 Plaintiff seeks this extension, due to Plaintiff having been unavailable to assist in this matter
 8 for well in excess of one month. Plaintiff suffered a serious life-threatening medical event,
 9 and only in the last few days returned home. Plaintiff's counsel intends to discuss with
 10 Plaintiff the future of this litigation, prior to further incurring time and resources of the parties
 11 and the court, before responding to this Motion, or seeking other relief.

12 The parties stipulate that this circumstance constitutes good cause for the relief sought.
 13 The extension, if granted, would require moving the hearing, in order to allow Defendants'
 14 counsel a sufficient opportunity to serve a responsive brief. The parties further stipulate that
 15 good cause exists to extend the deadline for the Joint Status Report, currently February 9,
 16 2025, as ordered by this court on January 10, 2025 (ECF 3); however, as the Plaintiff needs to
 17 address foundational issues, the parties seek an extension of fourteen (14) days to file that
 18 Joint Status Report, such that it shall be due no later than February 24, 2025.

HALL JAFFE, LLP	CLARK COUNTY SCHOOL DISTRICT
<p>By: <u>/s/ Steven T. Jaffe</u> STEVEN T. JAFFE, ESQ. Nevada Bar No. 7035 7425 Peak Drive Las Vegas, Nevada 89128 <i>Attorney for Plaintiff</i></p>	<p>By: <u>/s/ Betty J. Foley</u> CRYSTAL J. PUGH, ESQ. Nevada Bar No. 12396 BETTY J. FOLEY, ESQ. Nevada Bar No. 14517 5100 W. Sahara Avenue Las Vegas, NV 89146 <i>Attorneys for Defendants</i></p>

Case No.: 2:25-cv-00050-JAD-MDC

ORDER

Based on the parties' stipulation [ECF No. 10] and good cause appearing, IT IS HEREBY ORDERED that plaintiff's **deadline to respond to the motion to dismiss** [ECF No. 5] is EXTENDED to 2/14/25; the parties' **deadline to file the joint status report** [ECF No. 3] is extended to 2/23/25; and the 2/19/25 hearing on the motion to dismiss [ECF No. 5] is CONTINUED to a stacked civil-hearing calendar on Monday, March 17, 2025, at 1:30 p.m.

U.S. District Judge Jennifer A. Dorsey
Dated: January 31, 2025